

**UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

## **PG&E CORPORATION,**

-and-

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## PACIFIC GAS AND ELECTRIC COMPANY.

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## Debtors.

- Affects PG&E Corporation
- Affects Pacific Gas and Electric Company
- Affects both Debtors

**Bankruptcy Case No. 19-30088 (DM)**

Chapter 11

(Lead Case)

**(Jointly Administered)**

## **JOINT NOTICE OF APPEAL**

*\*All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

**NOTICE IS HEREBY GIVEN** that Paradise Unified School District, Northern Recycling and Waste Services, LLC/Northern Holdings, LLC, and Napa County Recycling & Waste Services, LLC/Napa Recycling & Waste Services, LLC; Adventist Health System/West and Feather River Hospital d/b/a Adventist Health Feather River (together, “**Adventist Health**”); and Comcast Cable Communications, LLC and all affiliates (together, “**Comcast**,” and collectively with Paradise Unified School District, Northern Recycling and Waste Services, LLC/Northern Holdings, LLC, Napa County Recycling & Waste Services, LLC/Napa Recycling & Waste Services, LLC, and Adventist Health, the “**Appellants**”), by and through their undersigned counsel, hereby appeal to the United States Bankruptcy Appellate Panel of the Ninth Circuit, pursuant to 28 U.S.C. § 158(a) and Rule 8003 of the Federal Rules of Bankruptcy Procedure, from the *Order Confirming Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated June 19, 2020* [Bankr. Dkt. No. 8053] (the “**Confirmation Order**”)<sup>1</sup> entered in the above-captioned case on June 20, 2020,

<sup>1</sup> Capitalized terms used but not defined herein shall have the meaning ascribed to such terms in the Confirmation Order.

1 which Confirmation Order incorporates the Fire Victim Trust Agreement and all exhibits, including  
2 the Fire Victim Claims Resolution Procedures, filed with the Court on June 21, 2020 [Bankr. Dkt.  
3 No. 8057]. A copy of the Confirmation Order is attached hereto as Exhibit A. A copy of the Fire  
4 Victim Trust Agreement and all exhibits is attached hereto as Exhibit B.

5 As will be set forth in greater detail in the statement of issues and in their merits briefing,  
6 while the final order from which this appeal lies is the Confirmation Order, Appellants do not  
7 challenge the Court's determination to confirm the Plan, which became effective on July 1, 2020,  
8 and whose effectiveness is not challenged in this appeal. Rather, this appeal is addressed to certain  
9 aspects of the Fire Victim Trust Agreement, the Court's approval of which is incorporated into the  
10 Confirmation Order.

11 Pursuant to 28 U.S.C. § 158(a)(1), the Confirmation Order is appealable as a matter of right.  
12 Pursuant to 28 U.S.C. § 158(c)(1), the Appellants hereby elect to have this appeal heard by the United  
13 States Bankruptcy Appellate Panel of the Ninth Circuit.

14 Counsel for the Debtors, the Tort Claimants Committee, the pre-petition shareholders, and  
15 the Fire Victim Trustee all participated in the confirmation hearing. Appellants believe that upon the  
16 effectiveness of the Plan, the only potential appellee with a concrete stake in the appeal and thus with  
17 standing to defend the Bankruptcy Court's determination is the Fire Victim Trust. In an abundance  
18 of caution, however, the Reorganized Debtors are also listed as Appellees. Those parties and the  
19 names, addresses and telephone numbers of their respective attorneys are set forth below.

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[Continued on the following page]

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1 Dated: July 2, 2020

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